

1 S. BRENT VOGEL
Nevada Bar No. 006858
2 Brent.Vogel@lewisbrisbois.com
JOHN M. ORR
3 Nevada Bar No. 14251
John.Orr@lewisbrisbois.com
4 LEWIS BRISBOIS BISGAARD & SMITH LLP
6385 S. Rainbow Boulevard, Suite 600
5 Las Vegas, Nevada 89118
702.893.3383
6 FAX: 702.893.3789
Attorneys for CCS

8 UNITED STATES DISTRICT COURT

9 DISTRICT OF NEVADA

10 CHARLENE BYNUM individually, as the
11 wife of RONALD BYNUM and as the
Guardian of the Person and Estate of
RONALD BYNUM,

12 Plaintiff,

13 vs.

14 CITY OF NORTH LAS VEGAS; JACOB
15 RAY (P#1886); RODRIGO DELARA
(P#2417); JOHN E TONRY (P#1684) ;JESSE
16 LEE CESENA (P#2425); ALEXANDER
PEREZ; JEFFREY K. LYTTLE; YAPHET
17 MILLER; JOHN LANSING; SCOTT
NIELSEN; STEVEN MCKLEIN CITY OF
18 LAS VEGAS; MICHELLE FREEDMAN;
CITY OF LAS VEGAS CORRECTIONAL
19 OFFICERS: ALGIN BROOKS, ANGEL
JONES, ASHWORTH, CORY PRICE,
20 DANIELLE STONE, GABRIELLE ABBOT,
JASON JONES, JENNIFER BRADFORD,
21 JOSHUA LOPER, JULIO OLARTE,
KATHLEEN HENLEY, L. HENDERSON,
22 LANDROVE, LEIGH MANN, LORIN
SMITH, M. SZOSTEK, MARCOS PARKER,
23 MICHAEL DARREN, MILETTE JONES,
OFFICER CREAGER, OFFICER
24 EDWARDS, OFFICER JERNEE, OFFICER
KAHELE, OFFICER KATZ, OFFICER
25 MANRA, OFFICER MARKITZ, OFFICER
ROGERS, RAMON BROOKINS, ROBERT
26 MORRIS, S. MARTINEZ, Sergeant B.
GRIFFITH, Sergeant KELLEHER,
27 SERGEANT ALVIN KENON, Sergeant
LARRY GRAVES, SCOTT EDWARDS,
28 STEVE CHESNEY, TRAVIS ROZ, WESLEY

CASE NO. 2:17-cv-2102-APG-VCF

Consolidated with:

CASE NO. 2:18-cv-00354-APG-VCF

**STIPULATION AND ORDER FOR
EXTENSION OF TIME TO FILE
RESPONSIVE PLEADING TO
PLAINTIFF'S COMPLAINT (FIRST
REQUEST)**

1 STONE, SERGEANT DENT, CESAR
2 LANDROVE; CORRECT CARE
3 SOLUTIONS, LLC, a Purported Kansas
4 Limited Liability Company, Correct Care
5 Solutions Nurses: CN HAPLIN, CHARGE
6 NURSE, NOREEN EVANS, NURSE
7 ANDERSON, NURSE AVEN, NURSE
8 DARDEN, FRANCESCA NOCE, NURSE
9 NARE, NURSE NOCE, CHRISTOPHER
10 NEHLS, HAYDEE. TOLENTION,
11 JENNIFER SWAN, CHRISTINA SCHADE,
12 BARBARA BUTTINO CORRECT CARE
13 MANAGERS 1-10; CORRECT CARE MD
14 OR DO'S 1-5, MEDICAL DIRECTOR'S 1-5
15 DOES 1-100 and DOE ENTITIES 1-10.

16 Defendants.

17 IT IS HEREBY STIPULATED between Plaintiff CHARLENE BYNUM individually, as
18 the wife of RONALD BYNUM and as the Guardian of the Person and Estate of RONALD
19 BYNUM, by and through her counsel of record, Dan Winder, Esq., Arnold Weinstock, Esq., Scott
20 C. Dorman, Esq. of the Law Office of Dan M. Winder, P.C.; Defendants CITY OF NORTH LAS
21 VEGAS and MICHELLE FREEDMAN, by and through their counsel of record, Bradford R.
22 Jerbic and John A. Curtas; Defendants CITY OF NORTH LAS VEGAS, OFFICERS JACOB
23 RAY, RODRIGO DELARA, JOHN E. TONRY, JESSE LEE CESENA, CHIEF ALEXANDER
24 PEREZ, AND FIRE CHIEF JEFFERY K. LYTTLE, by and through their counsel of record, Robert
25 Freeman, Esq., of the law firm Lewis Brisbois Bisgaard & Smith, LLP; and Defendant CORRECT
26 CARE SOLUTIONS, LLC, by and through its counsel of record, S. Brent Vogel, Esq., and John
27 M. Orr, Esq., of the law firm Lewis Brisbois Bisgaard & Smith, LLP, pursuant to LR 6-1, 6-2, and
28 7-1, that the time for Defendant Correct Care Solutions, LLC to file a responsive pleading to
Plaintiff's Complaint [#1], on file herein, is hereby extended up to and including **March 29, 2018**.
The stipulation is entered to allow counsel sufficient time to consult with Defendant Correct Care
Solutions, LLC and investigate the allegations of the Complaint prior to filing a responsive
pleading.

This stipulation is made in good faith and not for the purpose of delay. Defendant Correct
Care Solutions, LLC is not disputing service of process. This is the first extension of time

1 requested by counsel for filing Defendant Correct Care Solutions, LLC's responsive pleading to
2 Plaintiff's Complaint.

3 Dated this 22nd day of March, 2018.

Dated this 22nd day of March, 2018.

4 By: /s/ Dan Winder
5 Dan M. Winder, Esq.
6 Nevada Bar No. 1569
7 Arnold Weinstock, Esq.
8 Nevada Bar No. 810
9 Scott C. Dorman, Esq.
10 Nevada Bar No. 13108
11 LAW OFFICE OF DAN M. WINDER, P.C.
12 3507 W. Charleston Blvd.
13 Las Vegas, Nevada 89102
14 *Attorneys for Plaintiffs*

By: /s/ Robert Freeman
Robert Freeman, Esq.
Nevada Bar No. 3062
LEWIS BRISBOIS BISGAARD & SMITH
6385 S. Rainbow Blvd., Suite 600
Las Vegas, Nevada 89118
*Attorneys for City of North Las Vegas,
Officers Jacob Ray, Rodrigo Delara,
John E. Tonry, Jesse Lee Cesena,
Chief Alexander Perez,
and Fire Chief Jeffrey K. Lytle*

15 Dated this 22nd day of March, 2018.

Dated this 22nd day of March, 2018.

16 By: /s/ John A. Curtas
17 Bradford R. Jerbic, Esq.
18 Nevada Bar No. 1056
19 John A. Curtas, Esq.
20 Nevada Bar No. 1841
21 495 S. Main Street, Sixth Floor
22 Las Vegas, Nevada 89101
23 *Attorneys for City of Las Vegas
24 and Michele Freeman*

By: /s/ John M. Orr
S. Brent Vogel, Esq.
Nevada Bar No. 6858
John M. Orr, Esq.
Nevada Bar No. 14251
LEWIS BRISBOIS BISGAARD & SMITH
6385 S. Rainbow Blvd., Suite 600
Las Vegas, Nevada 89118
Attorneys for Correct Care Solutions, LLC

ORDER

IT IS SO ORDERED.



UNITED STATES MAGISTRATE JUDGE

Dated: 3-22-2018